

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MARY LALIBERTE and MARIE MCKNIGHT, individually and as representatives of a class of similarly situated persons, on behalf of the QUANTA SERVICES, INC. 401(K) SAVINGS PLAN,

Plaintiffs,

V.

QUANTA SERVICES, INC.,

Defendant.

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Case No: 4:22-cv-03290 (AHB)

DECLARATION OF JEREMY P. BLUMENFELD IN SUPPORT OF
DEFENDANT’S MOTION TO EXCLUDE
THE PROPOSED EXPERT TESTIMONY OF DONALD C. STONE

I, Jeremy P. Blumenfeld, declare as follows:

1. I am an attorney with the law firm Morgan, Lewis & Bockius LLP, admitted to practice *pro hac vice* before this Court as counsel for Defendant Quanta Services, Inc. I submit this declaration in connection with Defendant's Motion to Exclude the Proposed Expert Testimony of Donald C. Stone. I have personal knowledge of the information stated in this declaration.

2. Attached as **Exhibit A** is a true and correct copy of the Expert Report of Dr. Adam Werner dated August 1, 2024, submitted by Plaintiffs in connection with this litigation.

3. Attached as **Exhibit B** is a true and correct copy of the Expert Report of Donald C. Stone dated August 1, 2024, submitted by Plaintiffs in connection with this litigation.

4. Attached as **Exhibit C** is a true and correct copy of the transcript of the deposition of Donald C. Stone taken on November 1, 2024.

5. Attached as **Exhibit D** is a true and correct copy of the transcript of the deposition of Dr. Adam Werner taken on September 9, 2024.

6. Attached as **Exhibit G** is a true and correct copy of the backup materials to Dr. Adam Werner's report dated August 1, 2024.

7. Attached as **Exhibit K** is a true and correct copy of the transcript of the deposition of Carolyn Campbell taken on June 27, 2024.

8. Attached as **Exhibit L** is a true and correct copy of the transcript of the deposition of Richard Marin taken on October 18, 2024.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 20 day of December, 2024, in Philadelphia, PA.

/s/ Jeremy P. Blumenfeld
Jeremy P. Blumenfeld